

Fact Sheet



For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-02300015-2011**
Application Received: **October 25, 2010**
Plant Identification Number: **023-00015**
Permittee: **JPC Limited Liability Company**
Facility Name: **Plant #8**
Mailing Address: **P.O. Box 130, Petersburg, WV 26847**
Revised: N/A

Physical Location: Petersburg, Grant County, West Virginia
UTM Coordinates: 660.643km Easting • 4317.058 km Northing • Zone 17
Directions: From the intersection of US Route 220 and State Route 28 in Petersburg, follow US Route 220 South to Airport Road. Turn right onto Airport Road and follow for approximately one mile to the Grant County Industrial Park. Turn right into the industrial park. Plant #8 is past Plant #4 on the right.

Facility Description

JPC Limited Liability Company's, Plant #8 is a lumber/wood products facility covered by Standard Industrial Classification (SIC) 2421. The plant has the potential to operate twenty-four (24) hours per day, seven (7) days per week and fifty-two (52) weeks per year. The plant operates a woodworking facility, and processes scrap wood for use as fuel in the boiler. There is one (1) pre-dryer and three (3) drying kilns at the facility that operate with steam heat generated from the boiler.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2009 Actual Emissions
Carbon Monoxide (CO)	80.59	16.36
Nitrogen Oxides (NO _x)	10.51	4.09
Particulate Matter (PM ₁₀)	16.64	4.84
Total Particulate Matter (TSP)	65.15	4.84
Sulfur Dioxide (SO ₂)	0.66	0
Volatile Organic Compounds (VOC)	7.88	0.52
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2009 Actual Emissions
Total Miscellaneous HAPs	0.73	0.45

Some of the above HAPs may be counted as PM or VOCs.

Title V Program Applicability Basis

Although this facility does not have the potential to emit over 100 tons per year of criteria pollutants or over 10 tons per year of a single HAP/25 tons per year of aggregate HAPs, JPC Limited liability Company's Plant #8 is contiguous with Allegheny Wood Products International, Inc., Plant #4. Since Plant #4 is required to have a Title V operating permit, Plant #8 is also required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:

45CSR2	To Prevent And Control Particulate Air Pollution From Combustion Of Fuel In Indirect Heat Exchangers
45CSR6	Open burning prohibited.
45CSR7	To Prevent And Control Particulate Matter Air Pollution From Manufacturing Processes And Associated Operations
45CSR10	Control of Sulfur Dioxide Emissions from Indirect Heat Exchangers
45CSR11	Prevention Of Air Pollution Emergency Episodes
45CSR13	Permits For Construction, Modification, Relocation And Operation Of Stationary Sources Of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, And Procedures For Evaluation

45CSR16	Standards of Performance for New Stationary Sources Pursuant to 40CFR Part 60
45CSR30	Operating permit requirement.
45CSR34	Emission Standards For Hazardous Air Pollutants
40 C.F.R. Part 60, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
40 C.F.R. Part 61, Subpart M	National Emission Standard For Asbestos
40 C.F.R. Part 63, Subpart JJJJJ	National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers
40 C.F.R. Part 64	Compliance Assurance Monitoring
40 C.F.R. Part 82, Subpart F	Ozone depleting substances
WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
<u>State Only:</u>	
45CSR4	To Prevent And Control The Discharge Of Air Pollutants Into The Open Air Which Causes Or Contributes To An Objectionable Odor Or Odors

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-1154	October 31, 1989	
CO-R30-E-2000-36	October 18, 2000	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

This is a renewal of the Title V permit which was issued on April 24, 2006. Changes to the most recent version of the Title V Permit consist of the following:

1) Title V Boilerplate changes

- **Condition 1.2.** - This condition has been added to show the latest version of any Rule 13, 14, and 19 permits with the Issuance date of such permit.

- **Condition 2.1.4.** – This condition has been added and states: *Unless otherwise specified in a permit condition or underlying rule or regulation, all references to a “rolling yearly total” shall mean the sum of the monthly data, values or parameters being measured, monitored, or recorded, at any given time for the previous twelve (12) consecutive calendar months.*
 - **Condition 3.1.1. and 3.1.2.** – These conditions were revised because the language in 45CSR§§6-3.1. & 3.2. was revised.
 - **Condition 3.1.3.** The citation of authority was changed because 45CSR15 was repealed and 40 CFR 61 is now incorporated into 45CSR34. Also expanded 40 C.F.R. 61 citation to 40 C.F.R. §61.145(b). Slight language revision.
 - **Condition 3.3.1.** – Subsection “d” was added to this condition. Also, section 14 of WV Code §§22-5-4 (a) was added in the citation of authority
 - **Condition 3.5.3. and 3.5.5.** These conditions were revised to require electronic submittal of the annual certification to USEPA. The certification shall now only be submitted to the USEPA by e-mail.
- 2) **40 CFR 63 Subpart JJJJJ -National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers**
- This rule is applicable to the wood-fired boiler. The boiler is defined as an existing biomass boiler and therefore are subject to biennial tune-up requirements specified in 40 CFR §63.11223. The boiler has a design capacity greater than 10 million Btu per hour and therefore it is also required to have a one-time energy assessment performed. The associated notifications, reporting and recordkeeping are also applicable. Conditions 4.1.14. – 4.1.17., 4.4.3., 4.4.4., and 4.5.4. – 4.5.7. have been added to the permit.
- 3) **40 CFR Part 64 – Compliance Assurance Monitoring (CAM)**
- The CAM rule was not applied to boiler 002S for particulate matter emissions (PM) during the last renewal. The potential to emit (PTE) PM was considered after the control devices as opposed to before the control devices and therefore it was determined that the CAM rule did not apply. However, the potential to emit PM from the boiler does in fact trigger the major source threshold limit before controls. Therefore CAM is applicable to the boiler. The permittee submitted a CAM plan in this renewal application for wood-fired Boiler 002S to assure compliance with the Permit R13-1154 PM mass emission limitation through emission point 002E. The wood-fired Boiler 002S is a CAM pollutant-specific emission unit (PSEU) for PM. The PM emissions from the boiler are controlled by a multiclone. Conditions 4.2.1., 4.2.2., 4.2.3., 4.3.1., 4.4.5., 4.5.8. have been either revised or added to the permit.

Monitoring per the CAM Plan will be as follows:

		PSEU Main Boiler 002S	
		Indicator No. 1*	Indicator No. 2
I.	Indicator	Method 5 Stack Test	Visible Emissions
	Monitoring Approach		Visible emissions from the multiclone exhaust will be monitored daily using EPA Method 22-like procedures

		PSEU Main Boiler 002S	
		Indicator No. 1*	Indicator No. 2
II	Indicator Range	3.8 lb/hr*	No visible emissions. An excursion is defined as any visible emissions during the daily observations.
	A. QIP threshold	Not provided at this time.**	Not provided at this time.**
III	Performance Criteria	Approved Stack Test Protocol.	Measurements are made at the emission point and are indicative of good operation and maintenance of the multiclone.
	A. Data Representativeness		
	B. Verification of Operational Status	NA	There are no <i>new or modified monitoring equipment</i> ; therefore, verification of operational status pursuant to §64.3(b)(2) is not applicable.
	C. QA/QC Practices and Criteria	Method 5 QA/QC procedures	The observer will be educated on the general procedures (Method 22-like) for determining the presence of visible emissions.
	D. Monitoring frequency	Once every 5 years \pm 12 months	The monitoring frequency is one time per day during daylight and normal operations.
	E. Data Collection Procedure	Per Method 5	The data is collected per Method 22 procedures.
	F. Averaging Period	6-hour average	None

* Indicator No. 2 for Boiler 002S is the primary CAM Indicator. Indicator No.1 is a support/verification for Indicator No. 2.

** A QIP threshold is not required to be part of the CAM plan. Since it was not included in the CAM plan for these indicators, it is not included here.

- The CAM rule is not applicable to Boiler 002S for Carbon monoxide (CO), since there is no add-on control device utilized to meet its emission limitation.
- The CAM rule is not applicable to the Boiler 002S for Oxides of Nitrogen (NO_x), Sulfur Dioxide (SO₂), Volatile Organic Compounds (VOCs), or Hazardous Air Pollutants (HAPs) since these pollutants do not trigger the pre-control major source threshold limits. Furthermore, there are no add-on control devices for these pollutants.
- The CAM rule is not applicable to the Manufacturing Building/Woodworking Machinery (003S) or Storage Silo (005S) since there are no pre control emissions of any regulated air pollutant (as defined in 40 CFR §64.1) greater than the major threshold trigger levels.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

- 45CSR§§2-8.1.a. and 8.2. The boiler has a design heat input less than 100 mmBtu/hr; therefore it is exempt from these sections per 45CSR§2-8.4.c.

45CSR§10-8.	The boiler combusts wood alone and is therefore exempt from this section per 45CSR§10-10.3.
45 CSR§7-3.7.	The only storage structure potentially subject to this section of 45CSR7 is the storage bin which holds the wood waste fuel for the boilers. Therefore, the bin is considered to be part of the fuel burning unit and is subject to the requirements of 45CSR2 and exempt from 45CSR7 requirements per 45CSR§7-10.
40 C.F.R. 60, Subpart Dc* <i>*Except §60.40c, §60.41c and §60.48c.</i>	The boiler is not subject to the SO ₂ and PM standards because it is under 30 mmBtu/hr heat input. It is, however, subject to the fuel recording provision.
Greenhouse Gas Permitting	This is a renewal Title V permit and there have been no modifications that would have triggered a PSD permit. Therefore, there are no applicable GHG requirements

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date:	August 16, 2011
Ending Date:	September 15, 2011

All written comments should be addressed to the following individual and office:

Frederick Tipane
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Frederick Tipane
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1215 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.